

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

JULIE DALESSIO, an individual,  
Plaintiff,  
v.  
UNIVERSITY OF WASHINGTON,  
Defendant.

No. 2:17-cv-00642-RSM

DECLARATION OF DEREK C. CHEN  
IN SUPPORT OF DEFENDANT'S  
OPPOSITION TO PLAINTIFF'S  
MOTION TO COMPEL DISCOVERY  
RESPONSES

I, Derek C. Chen, declare as follows:

1. I am one of the attorneys representing the Defendant in this lawsuit. I make this declaration based upon my own personal knowledge, upon facts which are admissible in evidence. I am competent to testify to the matters set forth in this declaration.

2. Upon belief, Plaintiff served her Second Interrogatories and Requests for Production of Documents on or around July 14, 2017.

3. The parties met and conferred regarding these discovery requests on October 23, 2017 and November 13, 2017, but were unable to resolve all disputes.

4. The following exhibits are cited or relied upon in Defendant's Opposition to Plaintiff's Motion to Compel Discovery Responses:

A. Attached as **Exhibit A** is a true and correct copy of the Complaint filed by Plaintiff in King County Superior Court.

1                   B.       Attached as **Exhibit B** is a true and correct copy of Plaintiff's First  
2                   Interrogatories and Requests for Production and the University's objections and  
3                   responses.

4                   C.       Attached as **Exhibit C** is a true and correct copy of Plaintiff's  
5                   Second Interrogatories and Requests for Production and the University's objections  
6                   and responses.

7                   I declare under penalty of perjury under the laws of the State of Washington that the  
8                   foregoing is true and correct to the best of my knowledge.

9  
10                  DATED this 13<sup>th</sup> day of November, 2017, at Seattle, Washington.

11                  \_\_\_\_\_  
12                  /s/ *Derek C. Chen*  
13                  Derek C. Chen, WSBA #49723